

BEFORE THE ENERGY FACILITY SITING COUNCIL  
OF THE STATE OF OREGON

In the Matter of the Amendment )  
of the Eugene-Medford 500 kV )  
Transmission Line Site ) APPLICATION FOR SITE  
Certification Agreement Between ) CERTIFICATE AMENDMENT  
the State of Oregon Acting by ) (Amendment No. 2)  
and Through Its Energy Facility )  
Siting Council and Pacific Power )  
& Light Company )

I. INTRODUCTION

The Eugene-Medford 500 kV Transmission Line Site Certification Agreement ("Agreement") was executed by Pacific Power & Light Company ("Pacific") and the State of Oregon acting by and through its Energy Facility Siting Council ("EFSC") on December 21, 1982. The Agreement authorizes Pacific to build and operate a 500 kV transmission line and associated facilities between Eugene and Medford, Oregon. Amendment Number 1 to the Agreement, which amended Section III.A., concerning construction completion dates, was executed between Pacific and EFSC on July 15, 1988.

Because of unexpected site and engineering constraints and concerns raised by property owners along the existing route described in the Agreement, Pacific has determined that minor modifications of the route would be beneficial to Pacific and the public health, safety, and welfare. Accordingly, Pacific respectfully requests that EFSC amend the Agreement to authorize the following actions:

(1) relocation of the new Dixonville Substation facilities, described in Section II.B.3. of the Agreement, from the existing substation site to a nearby site, including rerouting of the 500 kV transmission line to the new site;

(2) rerouting of approximately 3.6 miles of the Canyonville Relocation described in Section II.A.2.(i) of the Agreement;

(3) rerouting of approximately 7.45 miles of the Green Mountain Relocation described in Section II.A.2.(ii) of the Agreement; and

(4) rerouting of approximately 2 miles of the approved route in the Ramsey Canyon-Meridian Substation (Dry Creek Road) Segment described in Section II.A.3. of the Agreement.

The proposed amendment is attached as Exhibit A and the proposed modifications are described with more particularity in maps attached as Exhibit B.

For the reasons set forth herein, the proposed amendment is desirable and does not adversely affect the public health, safety, or welfare. Therefore, pursuant to Section VII.F. of the Agreement, EFSC may approve the amendments without further proceedings.

## II. DISCUSSION

In support of this Application, Pacific alleges:

### A. Dixonville Substation Relocation

1. The site area of the existing Dixonville Substation referred to in Section II.A. of the Agreement is insufficient

to accommodate the addition of the 500 kV to 230 kV transformer bank and power circuit breakers described in Section II.B.3. of the Agreement.

2. Due to this and other site constraints, Pacific has acquired an approximately 40-acre parcel of land near the existing substation on which it proposes to relocate these additional facilities. This relocation will require Pacific to reroute the 500 kV transmission line across Pacific's property and property owned by Roseburg Forest Products to the new substation site by deviating from the existing Alvey-Dixonville 230 kV transmission line described in Section II.A.1. The rerouting, described more particularly in Exhibits A and B, will begin approximately one mile north of the new site and will rejoin the approved route south of the new site at the existing Dixonville Substation. The new route will use a 175-foot-wide right of way. Right of way approval from Roseburg Forest Products is pending.

3. Douglas County approved a major land partition for the new 40-acre site for use as an electric utility substation on March 9, 1989. Pacific has been orally advised by Douglas County that the proposed electrical transmission facilities are permitted outright by the County and that partition approval is the only land use approval required for the new substation and transmission line relocation. A copy of the partition decision, findings of fact, and related documents are attached as Exhibit C.

4. The new site for relocation of the additional substation facilities and the proposed rerouting consists primarily of grazing land near the existing substation and the Roseburg Forest Products lumber mill and log pond. No residences are near the new substation site or the proposed rerouting. As described in the statement by Dr. Paul Higgins, attached as Exhibit D, this new substation site and the modified route of the transmission line to the site have no known significant environmental, historical, or archaeological value. Therefore, relocation of the additional facilities contemplated in Section II.B.3. and the associated transmission line relocation will not have any significant adverse effect on environmental, historical, or archaeological resources and will be consistent with OAR 345-80-060.

B. Canyonville Rerouting

1. The approved Canyonville route described in Section II.A.2.(i) of the Agreement is approximately 3.6 miles in length. In the spring and summer of 1989 Pacific began detailed surveying and engineering design of this portion of the transmission line route and determined that a route change was needed because of unanticipated engineering difficulties associated with steep terrain. In addition, the approved route would require construction of up to three miles of new access road for each mile of right of way.

2. The proposed rerouting, described in Exhibits A and B, would be of approximately the same length and generally

within 2000 feet of the approved route. It would, however, cross fewer steep slopes and maximize the use of existing access roads, requiring about 1000 feet of new access road for each mile of right of way. There are no residences within several thousand feet of the centerline of the proposed rerouting.

3. The proposed rerouting crosses Bureau of Land Management (BLM) land and private land. Right of way approval from all property owners has been obtained or is imminent.

4. Pacific has been orally advised by Douglas County that electrical transmission facilities are permitted outright by the County and that no land use approval from the county is required for the proposed rerouting.

5. An environmental assessment for the proposed rerouting was conducted and is attached as Exhibit E, together with the BLM's approval of the assessment. The proposed route lies entirely within forest land in an area where there has been extensive logging. The assessment demonstrates that the proposed rerouting will have fewer potential adverse environmental effects than the approved route, primarily because of reductions in soil erosion and removal of vegetation, and will be consistent with the standards contained in OAR 345-80-060.

C. Green Mountain Rerouting

1. The approved Green Mountain route described in Section II.A.2.(ii) of the Agreement is approximately seven

miles in length. In the spring and summer of 1989 Pacific began detailed surveying and engineering design of this portion of the transmission line route and determined that a route change was needed because of unanticipated engineering difficulties associated with steep terrain. In addition, the approved route would require construction of up to three miles of new access road for each mile of right of way.

2. The proposed rerouting, described in Exhibits A and B, would be approximately one-half mile longer than the approved route and approximately one-third mile to the west. It would, however, follow the existing right of way of line number 54 for approximately three miles, cross fewer steep slopes, and maximize the use of existing access roads, requiring about 1000 feet of new access road for each mile of right of way, although some upgrading of the existing access roads would be required. There are no residences within several thousand feet of the centerline of the proposed rerouting.

3. The proposed rerouting crosses BLM land and private land. Right of way approval from all property owners has been obtained or is imminent.

4. An environmental assessment for the proposed rerouting was conducted and is attached as Exhibit D, together with BLM's approval of the assessment. The proposed route lies entirely within forest land. The assessment demonstrates that the proposed rerouting will have fewer potential adverse

environmental effects than the approved route, primarily because of reductions in soil erosion and removal of vegetation, and will be consistent with the standards contained in OAR 345-80-060.

5. On June 4, 1990, the Jackson County Board of Commissioners approved Pacific's land use application for the proposed rerouting. Copies of documents related to this approval are attached as Exhibit F.

6. Pacific has been orally advised by Douglas County that electrical transmission facilities are permitted outright by the County and that no land use approval from the county is required for the proposed rerouting.

D. Meridian (Dry Creek Road) Rerouting

1. The approved Ramsey Canyon-Meridian Substation Segment described in Section II.A.3. of the Agreement follows the existing route of transmission line number 54. Concerns regarding this route were voiced by residents in the Dry Creek Road area of Jackson County. In order to alleviate these concerns, Pacific proposes to reroute approximately two miles of the approved route approximately one-half to three-quarters of a mile to the east, as described in Exhibits A and B. The proposed rerouting will be further away from existing residences and pass through an area of scrub oak. Letters from residents in support of the rerouting are attached as part of Exhibit F.

2. The proposed rerouting will cross over the land of Pacific and private land owners. All right of way approvals from these private land owners have been obtained.

3. On June 4, 1990, the Jackson County Board of Commissioners approved Pacific's land use application for the proposed rerouting. Copies of documents related to this approval are attached as Exhibit F.

4. As demonstrated by Exhibits B and F, the proposed rerouting will be shorter than the approved route and avoid residential areas. As demonstrated by Exhibit D, the proposed rerouting will not traverse any area of known significant environmental, historical, or archaeological value or otherwise adversely affect these values. For these reasons, the proposed rerouting is consistent with the standards contained in OAR 345-80-060.

E. General Discussion

1. The proposed amendment consists of minor route modifications and does not affect previous determinations of compliance with EFSC standards that are related to the transmission line generally. See Exhibit D. In addition, the proposed route modifications will not affect Pacific's obligation to construct and operate the transmission line in accordance with the applicable health and safety standards contained in OAR 345-80-055 and with Pacific's warranties in Section III of the Agreement.



2. As demonstrated above, the proposed route modifications comply with applicable environmental and land use standards and will reduce--and in part are expressly intended to reduce--potential adverse environmental, land use, and aesthetic effects of the transmission line.

3. The proposed route modifications are desirable and do not adversely affect the public health, safety, or welfare. Accordingly, pursuant to Section VII.F. of the Agreement, EFSC may grant the requested amendment without further proceedings.

### III. CONCLUSION

Based on the foregoing, Pacific respectfully requests that EFSC amend the Agreement in accordance with the attached Exhibit A and pursuant to Section VII.F. of the Agreement.

DATED: June 7, 1990.

*Steven L. Pfeiffer by Myrl R. Cope*  
Steven L. Pfeiffer  
Of Attorneys for Pacific

EXHIBITS B THROUGH F ARE ON FILE AT THE DEPARTMENT OF ENERGY. THEY ARE  
TOO LARGE TO INCLUDE IN THIS MAILING.

IF YOU ARE INTERESTED IN SEEING THESE YOU MAY CONTACT:

TOM MEEHAN AT 378-6916, or

MARILYN FORSYTH AT 378-2843.

AMENDMENT NUMBER 2

Eugene-Medford 500 kV Transmission Line  
Site Certification Agreement

between

The State of Oregon  
acting by and through Its  
Energy Facility Siting Council

and

Pacific Power & Light Company

Recitals

1. The Eugene-Medford 500 kV Transmission Line Site Certification Agreement ("Agreement") was executed by Pacific Power & Light Company ("Pacific") and the State of Oregon acting by and through its Energy Facility Siting Council ("EFSC") on December 21, 1982. The Agreement authorizes Pacific to build and operate a 500 kV transmission line and associated facilities between Eugene and Medford, Oregon. Amendment Number 1 to the Agreement, which amended Section III.A., concerning construction completion dates, was executed between Pacific and EFSC on July 15, 1988.

2. Because of unexpected site and engineering constraints and concerns raised by property owners along the existing route described in the Agreement, Pacific has determined that minor modifications of the route would be beneficial to Pacific and to the public health, safety, and welfare. Accordingly, Pacific has requested that EFSC amend the Agreement to authorize the following actions:

a. Relocation of the additions to the existing Dixonville Substation, as described in Section II.B.3. of the Agreement, from the existing substation site to an adjacent site, including rerouting of the transmission line to the new site. This relocation is requested because the existing substation site proved to be insufficient to accommodate the contemplated additions.

b. Rerouting of approximately 3.6 miles of the Canyonville Relocation described in Section II.A.2.(i) of the Agreement. This rerouting is requested in order to avoid unanticipated engineering difficulties associated with the steep terrain of the approved route and in order to reduce the length of new access roads that must be constructed.

c. Rerouting of approximately 7.45 miles of the Green Mountain Relocation described in Section II.A.2.(ii) of the Agreement. This rerouting is requested in order to avoid unanticipated engineering difficulties associated with the steep terrain of the approved route and in order to reduce the length of new access roads that must be constructed.

d. Rerouting of approximately 2 miles of the approved route in the Ramsey Canyon-Meridian Substation (Dry Creek Road) Segment described in Section II.A.3. of the Agreement. This rerouting is requested in order to alleviate the concerns of persons who reside near the approved route.

## Findings and Conclusions

1. EFSC sent notice of Pacific's requested amendment to all affected State agencies and all persons who could be located who were parties to the original site certification proceedings.

2. Pacific's requested amendment, its application therefor, and comments received were reviewed and considered by EFSC at its public meeting on June 26, 1990.

3. Based on its review and consideration, EFSC finds that Pacific's requested amendment is reasonable, does not adversely affect the public health, safety, or welfare, and is consistent with all applicable standards. EFSC agrees that the requested amendment to the Agreement is desirable and should be made pursuant to Section VII.F. of the Agreement.

In consideration of the foregoing, the following Amendment Number 2 to the Agreement is made and entered into by the State of Oregon, acting by and through its Energy Facility Siting Council, and PacifiCorp, an Oregon corporation doing business as Pacific Power & Light Company:

1. Section II.A. of the Agreement is deleted in its entirety and replaced with the following (new material is in bold and underlined; deleted material is in bold and bracketed):

### II. ROUTE AND TRANSMISSION LINE DESCRIPTION

#### A. Route Description

The site of the route along which the transmission line is to be constructed is as follows:

1. Spencer - Dixonville Segment: Beginning at the existing Spencer Switching Station in Section 21,

Township 18 South, Range 3 West, W.M., Lane County, Oregon, and running thence southerly along the route of PP&L's existing Alvey-Dixonville 230 kV Transmission Line to the [existing Dixonville Substation in Section 24, Township 27 South, Range 5 West, W.M.,] Northwest Quarter of Section 7, Township 27 South, Range 4 West, W.M., Douglas County, Oregon. Along this segment of the transmission line, the line will replace the Alvey-Dixonville 230 kV Transmission Line (which will be removed), and will utilize the existing right-of-way plus an additional 50 feet of right-of-way width for the first 3.8 miles south of the Spencer Switching Station which is to be acquired to accommodate the larger line. From the Northwest Quarter of said Section 7, the line deviates from the existing Alvey-Dixonville 230 kV Transmission Line and runs southerly to the new Dixonville 500 kV Substation site in the Southwest Quarter of Section 18 in Township 27 South, Range 4 West, W.M., and in the Southeast Quarter of Section 13 and the Northeast Quarter of Section 24, both in Township 27 South, Range 5 West, W.M., all in Douglas County, Oregon and will utilize a right of way 175 feet wide.

2. Dixonville - Ramsey Canyon Segment: Beginning at the aforesaid Dixonville 500 kV Substation and running thence southwesterly to the existing Dixonville 230 kV Substation in the South Half of Section 24, Township 27 South, Range 5 West, W.M., Douglas County, Oregon; thence running south generally along the route of PP&L's existing Line No. 54 230 kV Transmission Line [No. 54] to a point near Ramsey Canyon, in Section 31, Township 34 South, Range 2 West, W.M., Jackson County, Oregon, with three deviations as described below. Along this segment of the transmission line, the line will replace Line No. 54 (which will be removed), and will utilize the existing right-of-way plus an additional 75 feet of right-of-way width which will be acquired to accommodate the larger line. The right-of-way width to be acquired for the relocated segments will be 175 feet. PP&L shall relinquish it's easements for the corresponding sections of the existing corridors except as noted in the relocated segments.

(i) Canyonville Relocation: Beginning at an angle point on Line No. 54 [in the northeast quarter of Section 25, Township 30 South, Range 5 West, W.M.,] in Government Lot 5 of Section 19, Township 30 South, Range 4 West, W.M., Douglas

County, Oregon; thence deviating from the existing corridor and heading in a [southerly] southeasterly direction [for] approximately [2-1/2 miles] two miles to an angle point in the Southeast Quarter of the Northwest Quarter of Section 31, Township 30 South, Range 4 West, said County and State; thence continuing in a southwesterly direction for approximately one and one-half miles before [rejoining] intersecting the existing Line No. 54 at an angle point in the southeast quarter of Section 1, Township 31 South, Range 5 West, W.M., [in] Douglas County, Oregon. PP&L [shall relinquish its easements for the corresponding section of the existing corridor, with the exception of the easements] will not relinquish the existing easements for the corridor north of the section line between Section 35, Township 31 South, Range 5 West, and Section 2, Township 31 South, Range 5 West.

(ii) Green Mountain Relocation: Beginning at an angle point on Line No. 54 [near the 1/4 corner common to Sections 7 and 8] in the Southwest Quarter of Section 28, Township 32 South, Range 4 West, W.M., in Douglas County, Oregon; thence southeasterly in a straight line, deviating from the existing Line No. 54 [and passing approximately 1/2 mile west of Green Mountain] for a [total] distance of approximately [seven] four miles, to a point [rejoining] intersecting the existing Line No. 54 in the Southwest Quarter of Section 11, Township 33 South, Range 4 West, W.M., in Jackson County, Oregon. [PP&L shall relinquish its easements for the corresponding section of the existing corridor.]

(iii) Evans Creek Relocation: Beginning at an angle point on Line No. 54 in the Northwest Quarter of Section 15, Township 34 South, Range 3 West, W.M., Jackson County, Oregon; thence southeasterly in a [generally] straight line, deviating from the existing Line No. 54 for a distance of approximately one and one-half miles before intersecting Line No. 54 at [a] an angle point in the Northwest Quarter of Section 23, Township 34 South, Range 3 West, W.M., Jackson County, Oregon, and thence continuing along the route of Line No. 54 to aforesaid point near Ramsey Canyon.

3. Ramsey Canyon - Meridian Substation Segment: Beginning at the aforesaid point near Ramsey Canyon; thence south through Sams Valley to Table

Rock Switching Station replacing the existing Line No. 54; thence parallel to Line No. 54 east and south following the existing transmission line corridor through the White City area to the Medford Sports Park; thence south and east along Line No. 54 to its termination at Meridian Substation, situated in the Southwest Quarter of Section 7, Township 37 South, Range 1 East, W.M., Jackson County, Oregon, with one deviation as described below.

(i) Meridian Relocation: Beginning at an angle point in the Northeast Quarter of Section 34, Township 36 South, Range 1 West, W.M., Jackson County, Oregon, thence southeasterly in a straight line deviating from Line No. 54 and the existing transmission line corridor approximately two miles to intersection with Line No. 54 and the existing transmission line corridor in the Southeast Quarter of Section 2, Township 37 South, Range 1 West; thence continuing parallel to Line 54 and the existing transmission line corridor to its termination at Meridian Substation situated in the Southwest Quarter of Section 7, Township 37 South, Range 1 East, W.M., Jackson County, Oregon.

2. The first sentence of Section II.B.3. of the Agreement is amended by inserting the words "the new Dixonville 500 kV Substation site described in Section II.A.1. near" between the words "circuit breakers at" and "the existing Dixonville Substation."



IN WITNESS WHEREOF, this Amendment Number 2 to the Eugene-Medford 500 KV Transmission Line Site Certification Agreement has been executed by the Chairman of the Energy Facility Siting Council of the State of Oregon and PacifiCorp, as below subscribed this 26<sup>th</sup> day of June, 1990.

STATE OF OREGON  
ENERGY FACILITY SITING COUNCIL

By: William S. Wiley  
Chairman

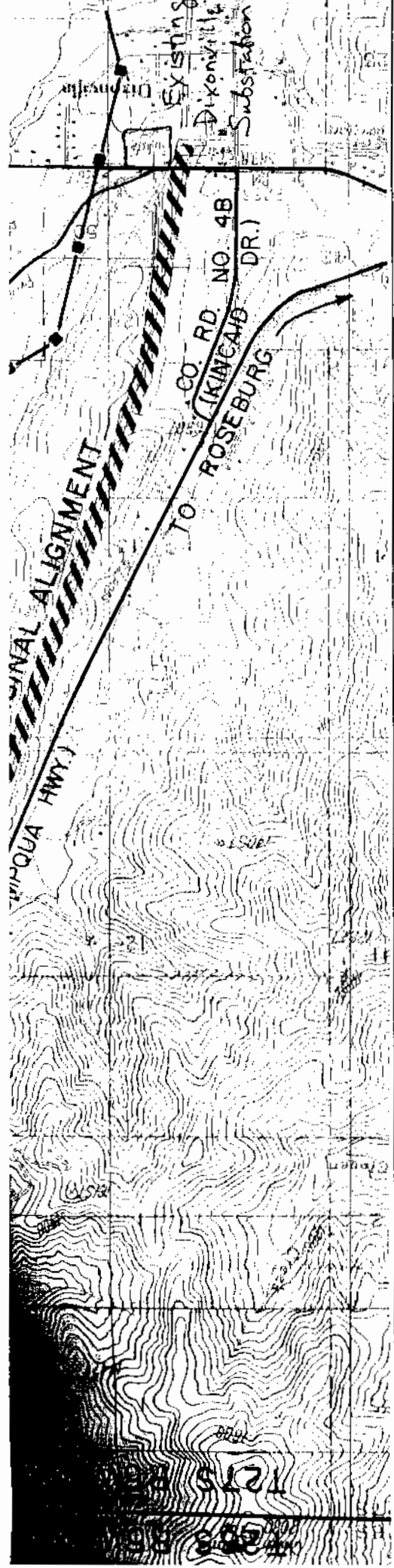
Attest: David Stewart Smith  
Secretary

PACIFICORP

By: James A. Balling

Attest: James F. Stenslie  
Asst. Corporate Secretary

- Exb A - Proposed Amendment - <sup>this</sup> in Red file  
Exb B - Maps - in this Red file  
Exb C - Douglas Co approval  
Exb D - Statement by Paul Higgins  
Exb E - BLM EA & approval  
Exb F - Jackson Co approval

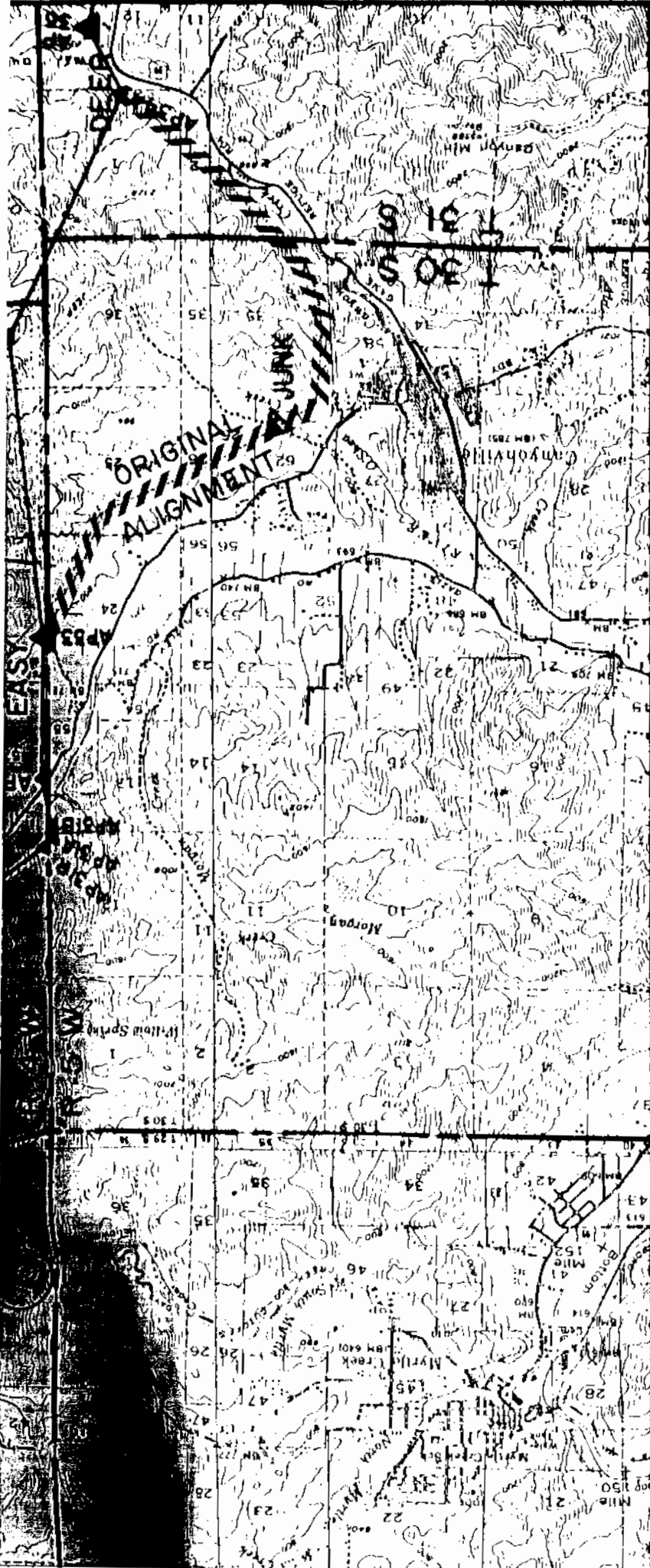


(EUGENE - MEDFORD 500 KV PROJECT)

Plant Locality No. 0

<p>G. E. RALEIGH AND ASSOCIATES, INC.          ENERGY FACILITIES          LOCATION CONSULTANTS          BEAVERTON, OREGON</p>		<p>ER</p>	
<p>DATE</p>		<p>DR</p>	
<p>OES</p>		<p>CH</p>	
<p>TR</p>		<p>APPROVED</p>	
<p>SCALE - 1" = 2000'</p>		<p>SHEET 6 OF 6</p>	
<p>LINE 90  <b>ALVEY - DIXONVILLE</b>          500 KV TRANSMISSION LINE          TRANSPORTATION PLAN MAP</p>		<p>PACIFIC POWER &amp; LIGHT COMPANY          PORTLAND, OREGON</p>	
<p>PD-</p>		<p>PD-</p>	

*located in hard copy files only  
 - in application notebook*



*located in hand copy files  
Application notebook*

AP 95 1334+32.66 BK =  
1360+00.00 AH

AP 34A 1305+13.3

AP 34R 1219+85.60

AP 33 1114+79.73

AP 32 1065+40.60  
AP 31 B 1046+55.91 BK =  
1047+96.61 AH

AP 31 A 1040+42.38

AP 31 R 1032+99.56

AP 30 1006+45.85

AP 29 986+06.61

AP 28 946+00.22

AP 27 890+74.54

AP 26 848+64.67

AP 25 832+00.78

AP 24 803+77.99

AP 23 779+95.26

AP 22 756+86.19

LINE 91	
DIXONVILLE-MERIDIAN	
500 KV TRANSMISSION LINE	
Miles shown from Dixonville Substation	
PACIFIC POWER & LIGHT COMPANY	
PORTLAND, OREGON	
SHEET	1 OF 3
REV.	

G. E. RALEIGH AND ASSOCIATES, INC.  
ENERGY FACILITIES  
LOCATION CONSULTANTS  
BEAVERTON, OREGON



Exhibit B



PACIFIC POWER 920 S.W. Sixth Avenue · Portland, Oregon 97204 · (503) 464-5000

May 16, 1990

Mr. Alan R. Wood, Area Manager  
South Umpqua Resource Area  
Bureau of Land Management  
777 NW Garden Valley Boulevard  
Roseburg, Oregon 97470

Dear Mr. Wood:

Pursuant to your letter of May 2, 1990 requesting an additional discussion on electromagnetic effects to be added to the Environmental Assessment for Route Modifications of the Eugene - Medford 500 kV Transmission Project, please see the attached document. The previous draft has been modified on the last page, and an appendix has been added.

I trust these changes are responsive to your request, but if more is required, please let me know at 464-6467.

Sincerely,

Paul D. Higgins  
Principal Scientist

Attachment

(PH).051690b.let/dw

EXHIBIT E



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT

ROSEBURG DISTRICT OFFICE  
777 NW Garden Valley Boulevard  
Roseburg, Oregon 97470



IN REPLY REFER TO:

1795

MAY 18 1990

Mr. Paul Higgins  
Environmental Coordinator  
Pacific Power  
920 S.W. Sixth Avenue  
Portland, OR. 97204

5/22/90 Copied For:  
Jay Roundy  
Gary Larsen  
J. Walker  
H. Ferris  
R. Cernin

Dear Mr. Higgins:

Thank you very much for the recent draft of the Environmental Assessment (EA) for Route Modifications of the Eugene-Medford 500 kV Transmission Project. My staff has reviewed the document and feels that our comments transmitted to you in my letter of December 15, 1989 concerning wildlife, water resources, and cultural resources have been adequately incorporated.

As pointed out in the conversation between you and Joe Ross, Resource Operations Manager on my staff, on April 18, 1990, we also feel that the potential effects on health due to long-term exposure to electro-magnetic fields (EMF) needed to be addressed in the EA for the route modifications. Local public concern has recently been voiced concerning the potential health hazard of the upgrade to a 500 kV transmission line. Your recent addition to the EA adequately addresses current research on this issue, and concludes that no significant health hazard to people or animals would be created as a result of EMF from the 500 kV line.

My staff has enjoyed working with during the past two years on this project. I have informed our Medford District Office that the EA is acceptable to us for the Canyonville portion of the reroute, and I have recommended that they proceed with the FONSI/Decision Record and ROW amendment for your route modifications. If you have any questions or need any further assistance, please call Joe Ross at 672-4491 EXT. 248.

Sincerely,

Alan R. Wood  
Area Manager  
South Umpqua Resource Area

cc: Jan Miller, BLM Medford

EXHIBIT E

RECEIVED DEC 11 1989



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

MEDFORD DISTRICT OFFICE  
3040 Biddle Road  
Medford, Oregon 97504

IN REPLY REFER TO:  
OR 25602  
2850(11200)  
CPR-2-CO-218  
8123L(JM:ms)

DEC 11 1989

Mr. Richard Cernin  
Permit Specialist  
Pacific Power  
920 S.W. Sixth Avenue  
Portland, Oregon 97204

Dear Mr. Cernin:

We have reviewed the environmental assessment for the route modification and find it acceptable for the Medford portion of the route save for one area. The document does not address possible threatened and endangered plants along the route. We feel, at a minimum, they should be covered as the cultural resource portion has been handled.

If you have any questions, please contact the District Botanist, Joan Seevers at 770-2232. *General Office # 770-2250*

The Roseburg District will be contacting you regarding concerns they have on the Canyonville reroute by separate letter.

Sincerely,

Chief, Lands and Minerals

12/13/89

Copied for: Jerry Walker - 660 PFFC  
Paul Higgins - 800 PFFC

*Spoke with Joan Seevers on 6/27/90. She said she felt that the ES should have better addressed endangered/threatened plants. But, BLM did not believe that any such species would be affected and was not concerned about proposed route revisions.*

*TRM*

EXHIBIT E